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September 22, 2023

**BY ECF**

Hon. Carol Bagley Amon, U.S.D.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States of America v. Juan Cortes*, United States District Court for the Eastern District of New York, Case No. 22-cr-288 (CBA); Request for Entry on Docket as Interested Party

Dear Judge Amon:

We represent Madison Asset LLC (“Madison”) and its Joint Official Liquidators, Martin Trott and Christopher Smith. Madison is a victim of Defendants in the above-referenced action. By this letter, Madison requests that it be added the docket in this case as an interested party, so that Madison can receive ECF notifications and have the opportunity to assert its rights under 18 U.S.C. §§ 3663A (the Mandatory Victims Restitution Act or MVRA) and 3771 (the Crime Victims’ Rights Act or CVRA), and Fed. R. Crim. P. 32(c)(1)(B). Madison is in liquidation proceedings in the Grand Court of the Cayman Islands. There is a Chapter 15 proceeding, Case No. 18-12814, pending before the U.S. Bankruptcy Court for the Southern District of New York, in which Madison’s Joint Official Liquidators were recognized as Foreign Representatives. Madison understands that any requests for restitution under the MVRA or CVRA require Madison to be formally listed as an interested party on the docket.

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Please let me know if there is any further information that I can provide on behalf of Madison to assist your consideration of this request.

Respectfully submitted,

/s/ Jeffrey E. Gross

Jeffrey E. Gross

Woodworth B. Winmill

REID COLLINS & TSAI LLP

cc: Counsel of record (via ECF)